

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  
WINC, INC. et al,<sup>1</sup> ) Chapter 11  
 )  
 ) Case No. 22-11238 (LSS)  
 )  
 ) (Jointly Administered)  
 )  
 )  
 ) Hearing: March 11, 2024 @ 2:00 p.m.  
 ) Obj. Deadline: February 20, 2024 @ 4:00 p.m.  
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**NOTICE OF FIRST OMNIBUS OBJECTION  
(NON-SUBSTANTIVE) OF THE CLUB W. CREDITOR TRUST  
SEEKING ENTRY OF AN ORDER DISALLOWING AND EXPUNGING  
CERTAIN CLAIMS (DUPLICATE, AMENDED OR SUPERSEDED CLAIMS)**

**PLEASE TAKE NOTICE** that on January 30, 2024, the Club W Creditor Trust (the “Creditor Trust”), by and through counsel, filed the *First Omnibus Objection (Non-Substantive) of the Club W. Creditor Trust Seeking Entry of an Order Disallowing and Expunging Certain Claims (Duplicate, Amended or Superseded Claims)* (the “Omnibus Objection”).

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to the Omnibus Objection (each, a “Response”) shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure, and the Local Bankruptcy Rules for the District of Delaware, and shall be filed with the Court so as to be actually received no later than **Tuesday, February 20, 2024 at 4:00 p.m. (Prevailing Eastern Time)** (the “Response Deadline”—on Counsel to the Creditor Trust: (a) ArentFox Schiff LLP, 1301 Avenue of the Americas, Floor 42, New York, NY 10019 (Attn.: George P. Angelich, Esq.) and ArentFox Schiff LLP, 800 Boylston Street, 32nd Floor,

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Winc, Inc. (8960); BWSC, LLC (0899); and Winc Lost Poet, LLC (N/A). In accordance with Section 9.5 of the Plan, the Debtor Winc Lost Poet, LLC was dissolved as the Effective Date (as defined therein).

Boston, MA 02199 (Attn.: Justin A. Kesselman, Esq. and James E. Britton, Esq.) and (b) A.M. Saccullo Legal LLC, 27 Crimson King Drive, Bear, Delaware, 19701 Attn: Mark Hurford, Esq.

**A HEARING ON THE OMNIBUS OBJECTION WILL BE HELD** before the Honorable Laurie Selber Silverstein of the United States Bankruptcy Court for the District of Delaware (the “Court”), 824 N. Market Street, 6<sup>th</sup> Floor, Courtroom No. 2, Wilmington, DE 19801, on **MARCH 11, 2024 AT 2:00 P.M. (Prevailing Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE** that if no Responses are timely filed and served with respect to the Omnibus Objection, the Creditor Trust shall, on or after the Response Deadline, submit to the Court an order substantially in the form annexed as **Exhibit B** to the Omnibus Objection, which order the Court may enter without further notice or opportunity to be heard.

**IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.**

**PLEASE TAKE FURTHER NOTICE** that the Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates in open court at the Hearing.

**PLEASE TAKE FURTHER NOTICE** that copies of the Omnibus Objection may be obtained free of charge by visiting the website of the Claims and Noticing Agent in this case, <https://dm.epiq11.com/Winc>, or upon request to the Debtors' claim and voting agent, Epiq Corporate Restructuring, LLC, by (i) telephone at (855) 608-2412 (US & Canada) or +1 (503) 461-3028 (outside U.S. & Canada) or (ii) email at WincInfo@epiqglobal.com..

Dated: January 30, 2024  
Wilmington, Delaware

/s/ Mark T. Hurford  
Mark T. Hurford (DE No. 3299)  
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